

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

LUDA CHRISTINE HAYWARD : Case No. 1:11-cv-00526-RLY-DKL
LEFORGE,

Plaintiff,

vs.

FEIWELL & HANNOY, P.C.,

Defendant.

PLAINTIFF'S REQUEST FOR *VOIR DIRE* QUESTIONS

Now comes Plaintiff, by and through counsel, and requests that, at such time as *voir dire* of the jury venire is conducted, the Court ask the jury each of the attached questions number 1 through 7.

Respectfully submitted,

/s/ Kyle D. Murray
Kyle D. Murray [28307-15]
Attorney for Plaintiff
The Murray Law Firm, LLC
5716-A Signal Hill Court
Milford, Ohio 45150
Ph: 513-248-1550
Fax: 513-248-1559
kyle@murraylawandtitle.com

PLAINTIFF'S REQUESTED VOIR DIRE QUESTION NUMBER ONE

Do you know:

- Luda Christine Hayward LeForge;
- David LeForge;
- Any employees of Feiwell & Hannoy, P.C.;
- Kyle D. Murray; and
- Any employees of Kightlinger & Gray, LLP;

PLAINTIFF'S REQUESTED VOIR DIRE QUESTION NUMBER TWO

The facts in this case include Feiwell & Hannoy, P.C.'s attempt to collect a debt allegedly due to Bank of America from Luda Christine Hayward LeForge. Do you have any knowledge of this case?

PLAINTIFF'S REQUESTED VOIR DIRE QUESTION NUMBER THREE

Are there any members of the venire who are or have been engaged in or employed by a business or law office which collects debts or who have family members or close friends who are so employed?

PLAINTIFF'S REQUESTED VOIR DIRE QUESTION NUMBER FOUR

Are there any members of the venire who are or have been engaged in or employed by the business or individual who refers accounts to a debt collector for collection, or who have family members or close friends who are so employed?

PLAINTIFF'S REQUESTED VOIR DIRE QUESTION NUMBER FIVE

Are there any members of the venire who are or have been engaged in or employed by a business or individual which extends or collects credit, or who have family members or close friends who are so employed?

PLAINTIFF'S REQUESTED VOIR DIRE QUESTION NUMBER SIX

Are there any members of the venire who feel for any reason not discussed, that they could not sit and hear this case and thereafter render a verdict which would be fair to both the Plaintiff and the Defendant under the evidence as it may be presented?

PLAINTIFF'S REQUESTED VOIR DIRE QUESTION NUMBER SEVEN

If you determine that the debt collector has violated the Fair Debt Collection Practices Act, would you, for any reason, be unable to award statutory damages as instructed by the Court in addition to actual damages?

CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2014, the foregoing pleading was electronically filed. Service of this filing will be made on the following ECF-registered counsel by operation of the Court's electronic filing system. Parties may access this document via the court's electronic filing system.

Nicholas Ward Levi
KIGHTLINGER & GRAY
nlevi@k-glawn.com

Peter A. Velde
KIGHTLINGER & GRAY
pvelde@k-glawn.com

Susan Marie Woolley
FEIWELL & HANNOY, P.C.
swoolley@feiwelhhannoy.com

/s/ Kyle D. Murray
Kyle D. Murray